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March 15, 2012

VIA ELECTRONIC FILING

Hon. Michael A. Shipp, U.S.M.J.
U.S. District Court, District of New Jersey
50 Walnut Street
Newark, New Jersey 07102

Re: Dare Investments, LLC v. Chicago Title Ins. Co., Case No.: 10-6088

Dear Judge Shipp:

We represent Chicago Title Insurance Company ("Chicago Title") in the above matter. As the Court is aware, this matter was stayed for sixty (60) days to permit plaintiff Dare Investments, LLC ("Dare") to obtain new counsel after their prior counsel's *pro hac vice* admission was revoked and local counsel disqualified. Dare has now retained new counsel, Arthur Russell, Esq., and Jethro Eisenstein, Esq. (*pro hac vice* admission pending), who entered an appearance well in advance of the expiration of the sixty-day period. Presently, there is a telephonic status conference scheduled for March 30, 2012, with a joint submission due to be filed on March 23, 2012. The parties have been discussing various discovery issues in preparation of the joint submission and believe the certain issues may be narrowed or resolved altogether prior to bringing them to Your Honor's attention. In addition, counsel for the parties have pre-planned vacations now and through these dates that affect their ability to meet-and-confer on these matters. Counsel for the parties agree that additional time is needed to do so and narrow issues to raise with the Court in light of their schedules. Accordingly, Chicago Title, with the consent and agreement of counsel for Dare, respectfully request that the status conference be adjourned until April 20, 2012, with a joint submission due April 13, 2012.

Thank you for your consideration.

Respectfully,

A handwritten signature in black ink that reads "MRO'Donnell".

Michael R. O'Donnell

cc: Arthur Russell, Esq. (via ECF)
Jethro Eisenstein, Esq. (via ECF)

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